

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

FILED

2019 DEC -4 PM 1:22

UNITED STATES OF AMERICA,

Plaintiff,

v.

**ALEJANDRO CARRILLO,
a.k.a John Larranu,
Oscar Miranda, and Jose Urueta,**

Defendant.

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**CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SEALED**

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BY DEPUTY

NO. EP-19-CR-

EP 19CR3932

GOVERNMENT'S MOTION TO SEAL INDICTMENT

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now the United States of America, by and through the Deputy Assistant Attorney General for the Environment and Natural Resources Division of the U.S. Department of Justice, and files this Motion to Seal Indictment in the above numbered cause and would show the Court as follows:

On December 4, 2019, the Grand Jury returned a True Bill of Indictment, charging the above named defendant in the above numbered cause. The disclosure of the existence of the Indictment would seriously jeopardize the ability of law enforcement officers to locate the Defendant and apprehend Defendant without incident. The Government therefore seeks an Order of the Court placing the Indictment and related documents concerning the above named Defendant in the above numbered cause under seal. **When the Defendant is arrested, the Indictment and related documents will be unsealed.**

Accordingly, the United States respectfully requests that the Indictment in the above entitled and numbered cause and this Motion and Order be sealed until further order of this Court or until the Defendant is arrested.

JEAN E. WILLIAMS
DEPUTY ASSISTANT ATTORNEY GENERAL
ENVIRONMENT AND NATURAL
RESOURCES DIVISION

By:


Gary N. Donner
Trial Attorney
Environmental Crimes Section
U.S. Department of Justice